Exhibit C

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

ORACLE AMERICA, INC.	Case No. CV 10-03561 WHA
Plaintiff,	**PLAINTIFF'S INTERROGATORIES TO DEFENDANT GOOGLE INC., SET FOUR**
v.	
GOOGLE INC.	Dept.: Courtroom 9, 19th Floor
Defendant.	Judge: Honorable William H. Alsup

PLAINTIFF'S INTERROGATORIES TO DEFENDANT GOOGLE INC., SET FOUR
CASE NO. CV 10-03561 WHA
pa-1470231

1   PROPOUNDING PARTY: PLAINTIFF ORACLE AMERICA, INC.

2   RESPONDING PARTY: DEFENDANT GOOGLE, INC.

3   SET: FOUR (Nos. 20-25)

4   In accordance with Federal Rule of Civil Procedure 33, Plaintiff Oracle America, Inc.

5   ("Oracle") hereby propounds the following interrogatories to Defendant Google Inc. ("Google"),

6   to be answered in writing within 30 days from service.

7   **DEFINITIONS AND INSTRUCTIONS**

8   As used below, the following terms have the meanings indicated:

9   1.   "Java Platform" refers to the Java programming language, the Java compiler, the

10   Java Virtual Machine, the Java Development Kit, the Java Runtime Environment, the Just-In-

11   Time compiler, Java class libraries, Java application programming interfaces, and Java

12   specifications and reference implementations.

13   2.   "Android" means "the Android Platform" and "Android" as referred to in

14   Google's Answer (Docket No. 32) at Background ¶ 12 and in Google's Answer to Amended

15   Complaint (Docket No. 51) at Background ¶ 12 and at Factual Background ¶¶ 11–17, and

16   includes any versions thereof (whether released or unreleased) and related public or proprietary

17   source code, executable code, and documentation.

18   3.   "Google" or "You" means Google Inc. and any companies that Google Inc. has

19   acquired, including Android, Inc. In directing these interrogatories to Google, we seek all

20   information available to Google, including information relating to companies Google has

21   acquired (such as Android, Inc.).

22   **INTERROGATORIES**

23   **INTERROGATORY NO. 20:**

24   Identify and describe in detail any non-infringing alternatives to the Android technologies

25   alleged to infringe the patents-in-suit and copyrights-in-suit considered by or available to Google

26   from the time Google began to develop Android up to and including the release of version 2.2

27   ("Froyo"), including Google's basis for rejecting each identified alternative.

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PLAINTIFF'S INTERROGATORIES TO DEFENDANT GOOGLE INC., SET FOUR
CASE NO. CV 10-03561 WHA
pa-1470231

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1 **INTERROGATORY NO. 21:**

2   Identify and describe in detail each modification made by third parties to the allegedly-

3 infringing portions of Android source code and documentation identified by Oracle's copyright

4 and patent infringement contentions, including the author of, date of, and basis for each such

5 modification.

6 **INTERROGATORY NO. 22:**

7   Describe in detail the steps that Google and Android device manufacturers perform to

8 retrieve, port, load, install, test, and/or execute Android on Android devices, including without

9 limitation the person or entity that performs each step and the physical location where each step is

10 performed.

11 **INTERROGATORY NO. 23:**

12   Please state the total amount of projected and actual advertising revenue from Android

13 devices (separately for phones and for other devices) that Google projected it would earn or has

14 earned in the United States separately for each month from November 2007 through December

15 2013.

16 **INTERROGATORY NO. 24:**

17   Identify and describe in detail all ways in which Google has reduced or expects to reduce

18 the amount of revenue sharing with third parties in connection with Android, including without

19 limitation the total amount of reduced revenue sharing that Google anticipated as of October 2007

20 and October 2008 in connection with Android.

21 **INTERROGATORY NO. 25:**

22   Identify (by production number, date, and author for any documents) and describe in

23 detail the basis for and materials considered in deriving all mobile revenue, profit, and unit

24 projections (written or otherwise) made from July 2005 through December 2008, broken out by

25 Android and non-Android revenue, profit, and unit projections.

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PLAINTIFF'S INTERROGATORIES TO DEFENDANT GOOGLE INC., SET FOUR
CASE NO. CV 10-03561 WHA
pa-1470231

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1   Dated: June 29, 2011

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CASE NO. CV 10-03561 WHA
pa-1470231

3